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PAUL GREG ROBERDS,
individually and on behalf of all others similarly situated

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Attorneys for Defendants
HEAVENLY VALLEY, LIMITED PARTNERSHIP
and THE VAIL CORPORATION

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

PAUL GREG ROBERDS, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

THE VAIL CORPORATION WHICH WILL
DO BUSINESS IN CALIFORNIA AS VAIL
RESORTS MANAGEMENT COMPANY, a
Colorado Corporation; HEAVENLY
VALLEY, LIMITED PARTNERSHIP, a
Nevada Limited Partnership; and DOES 1-50,
inclusive,

Defendants.

Case No. 2:21-cv-02251-JAM-CKD

**JOINT STIPULATION AND ORDER TO
STAY CASE PENDING APPROVAL OF
CLASS SETTLEMENT IN RELATED
CASE; ORDER**

Complaint Filed: September 8, 2021
Trial Date: None
District Judge: Hon. John A. Mendez
Courtroom 6, Sacramento
Magistrate Judge: Hon. Carolyn K. Delaney
Courtroom 24, Sacramento

1 Plaintiff PAUL GREG ROBERDS (“Plaintiff”) and Defendants THE VAIL
2 CORPORATION DBA VAIL RESORTS MANAGEMENT COMPANY and HEAVENLY
3 VALLEY, LIMITED PARTNERSHIP (“Defendants”) (collectively the “Parties”), by and through
4 their respective counsel of record, herein agree and stipulate as follows:

5 **STIPULATION**

6 WHEREAS, the Parties have reached a settlement to resolve all claims in this putative
7 wage and hour class and collective action (the “Settlement”);

8 WHEREAS, the Settlement resolves all claims in this lawsuit, as well as claims pled in
9 related cases *Gibson v. The Vail Corporation*, Case No. 2:21-cv-01260-WBS-DB (E.D. Cal.)
10 (“*Gibson*”); *Hamilton v. Heavenly Valley, Limited Partnership*, Case No. 2:21-cv-01608-WBS-DB
11 (E.D. Cal.) (“*Hamilton I*”); *Hamilton v. Heavenly Valley, Limited Partnership*, Case No.
12 SC20210148 (El Dorado County Superior Court) (“*Hamilton II*”); and *Heggen vs. Heavenly*
13 *Valley, Limited Partnership*, Case No. 2:21-cv-00107-WBS-DB (E.D. Cal.) (“*Heggen*”);

14 WHEREAS, the Parties have agreed as part of the Settlement to seek approval of the
15 Settlement in *Hamilton II*, and to immediately stay all deadlines in this case, *Heggen*, *Gibson*, and
16 *Hamilton I* pending approval of the Settlement in *Hamilton II*;

17 WHEREAS, the Parties anticipate that Plaintiffs will file a Motion for Preliminary
18 Approval of the Class Action Settlement in *Hamilton II* at the earliest possible date;

19 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, that the Parties request the
20 Court issue an order to stay all deadlines in this action and require the Parties to file a Joint Status
21 Report addressing the status of the settlement approval process, and any additional information that
22 the Court requires, on a date in March 2022, or such other date the Court deems appropriate.
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1 DATED: January 14, 2022

JAMES HAWKINS APLC

4 By: /s/ Jeanne Sarmiento

James R. Hawkins

Gregory Mauro

Michael Calvo

Jeanne Sarmiento

7 Attorneys for Plaintiff

8 PAUL GREG ROBERDS, individually and on
9 behalf of all others similarly situated

10 DATED: January 14, 2022

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

13 By: /s/ Evan R. Moses

Evan R. Moses

Melis Atalay

15 Attorneys for Defendants

16 HEAVENLY VALLEY, LIMITED
17 PARTNERSHIP and THE VAIL
18 CORPORATION
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ORDER

The Court having reviewed the foregoing stipulation, and GOOD CAUSE APPEARING THEREFOR, the Court orders as follows:

- (1) All deadlines in this action are hereby immediately stayed and vacated.
- (2) The Parties shall file a Joint Status Report addressing the status of the settlement approval process, and any additional information that the Court requires, on March 18, 2022.
- (3) A Status Conference Re Class Action Settlement is set for May 17, 2022 at 1:30 PM.

IT IS SO ORDERED.

DATED: January 18, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE